

1 Timothy D. Reuben [State Bar #94312]
Stephen L. Raucher [State Bar #162795]
2 Hana S. Kim [State Bar #313178]
REUBEN RAUCHER & BLUM
3 12400 Wilshire Boulevard, Suite 800
Los Angeles, California 90025
4 Telephone: (310) 777-1990
Facsimile: (310) 777-1989
5

6 Attorneys for Plaintiffs Hill RHF Housing Partners, L.P.
and Olive RHF Housing Partners, L.P.
7

8
9 **SUPERIOR COURT OF THE STATE OF CALIFORNIA**
10 **FOR THE COUNTY OF LOS ANGELES**

11 HILL RHF HOUSING PARTNERS, L.P., a
California limited partnership; OLIVE RHF
12 HOUSING PARTNERS, L.P., a California limited
partnership,
13

14 Petitioners/Plaintiffs,

15 vs.

16 CITY OF LOS ANGELES; DOWNTOWN
CENTER BUSINESS IMPROVEMENT
DISTRICT, a special assessment district in the
17 City of Los Angeles; DOWNTOWN CENTER
BUSINESS IMPROVEMENT DISTRICT
18 MANAGEMENT CORPORATION, a California
nonprofit corporation; and DOES 1 through 10,
19 inclusive,

20 Respondents/Defendants.
21

CASE NO. BS170127

[Assigned to Hon. Amy D. Hogue, Dept. 86;
Related to Case No. BS170352]

**EVIDENTIARY OBJECTIONS TO
DECLARATION OF SUZANNE HOLLEY IN
SUPPORT OF DCBID'S RESPONSIVE
TRIAL BRIEF**

Trial Date: September 19, 2018
Time: 9:30 a.m.
Dept: Dept. 86

Complaint Filed: July 3, 2017

22
23 TO ALL PARTIES AND THEIR COUNSEL OF RECORD:

24 Petitioners/Plaintiffs Hill RHF Housing Partners, L.P. and Olive RHF Housing Partners,
25 L.P. hereby submit the following evidentiary objection to the Declaration of Suzanne Holley,
26 filed in support of DCBID's Responsive Trial Brief.
27
28

- 1
- 2
- 3
- 4
- 5
- 6
- 7
- 8
- 9
- 10
- 11
- 12
- 13
- 14
- 15
- 16
- 17
- 18
- 19
- 20
- 21
- 22
- 23
- 24
- 25
- 26
- 27
- 28

I, SUZANNE HOLLEY, declare as follows:

1. I am the Executive Vice President & Chief Operating Officer for the Downtown Center Business Improvement District Management Corporation (“Management Corporation”). The Management Corporation oversees the day-to-day operations of the Downtown Center Business Improvement District (“DCBID”).
2. DCBID provides safety and sanitation services to the property owners within the District, among other services.
3. Angelus Plaza, located at 225 South Hill Street, and Angelus Plaza North, located at 200 South Oliver Street, are located within the DCBID (“Angelus Plaza Properties”).
4. As of April 2018, DCBISD completed 51 service calls to the Angelus Plaza Properties, some in response to calls from tenants there and other initiated by DCBID staff. These include responses to maintenance requests, wellness checks, response to work orders, and service calls, such as responding to concerns of trespassers on the properties.

Grounds for Objection No. 1: Inadmissible Extra-Record Evidence (*Western States Petroleum Assn. v. Superior Court*, 9 Cal.4th 571 (1995)); Irrelevant (Evidence Code §§ 210 and 350).

REUBEN RAUCHER & BLUM

By: Stephen L. Raucher
Stephen L. Raucher
Attorneys for Petitioners/Plaintiffs

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

PROOF OF SERVICE BY E-MAIL

STATE OF CALIFORNIA, COUNTY OF LOS ANGELES

I am employed in the County of Los Angeles, State of California. I am over the age of 18 and not a party to the within action; my business address is **12400 Wilshire Boulevard, Suite 800, Los Angeles, California 90025.**

On August 28, 2018, I served the foregoing document described as:

**EVIDENTIARY OBJECTIONS TO DECLARATION OF SUZANNE HOLLEY
IN SUPPORT OF DCBID’S RESPONSIVE TRIAL BRIEF**

on all interested parties in this action by *emailing* a true copy thereof to counsel for all interested parties pursuant to the Consent to Electronic Service And Notice of Electronic Notification Address in accordance with California Rules of Court 2.251 as follows:

Daniel M. Whitley, Esq. Deputy City Attorney City Hall East 200 N. Main Street, Room 920 Los Angeles, CA 90012 Telephone: (213) 978-7786 Facsimile: (213) 978-7811 Email: daniel.whitley@lacity.org <i>Attorneys for City of Los Angeles</i>	Michael G. Colantuono, Esq Holly O. Whatley, Esq. Pamela K. Graham, Esq. Colantuono, Highsmith & Whatley, PC 790 East Colorado Boulevard, Suite 850 Pasadena, CA 91101 Telephone: (213) 542-5700 Facsimile: (213) 542-5710 Email: mcolantuono@chwlaw.us Email: hwhatley@chwlaw.us Email: pgraham@chwlaw.us <i>Attorneys for Downtown Center Business Improvement District Management Corporation</i>
---	---

I am familiar with the office practice of Reuben Raucher & Blum for collecting and processing documents for delivery by E-mail. Under that practice, documents and email by Reuben Raucher & Blum personnel responsible for emailing are transmitted on that same day in the ordinary course of business. I emailed the above referenced documents, by agreement of the parties, to the address listed above.

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct.

Executed on August 28, 2018, at Los Angeles, California.


Nathalie Quach